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April 13, 2021

MEMO ENDORSED

Via ECF Filing

Honorable Valerie E. Caproni
Thurgood Marshall Courthouse
U.S. District Court – SDNY
40 Foley Square, Courtroom 443
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 4/13/2021

Re: Altaune Brown v. Happy Star Bakery Inc. et al.
NY Southern District Court, Case No.: 1:20-cv-10579-VEC

Dear Honorable Valerie Caproni:

We the attorneys for the Defendant Happy Star Bakery Inc. (“Defendant”) in the above referenced matter and are submitting this letter motion requesting an adjournment of the initial pretrial conference scheduled on April 16, 2021.

The complaint (ECF No. 1) was served upon the Defendant via the Secretary of State of the State of New York on December 28, 2020 (ECF No. 6). Our firm was retained by the Defendant today and accordingly filed a notice of appearance (ECF No. 10).

We have reached out to the Plaintiff’s counsel who has agreed to extend Defendant’s time to answer Plaintiff’s complaint by 30 days to May 12, 2021. Plaintiff and Defendant have begun a preliminary settlement discussion and intend to diligently pursue the same before the initial pretrial conference.

Since our firm has just been retained and will need some time to become familiar with the instant litigation and to pursue a meaningful settlement discussion with the plaintiff, we respectfully request the court for an order to adjourn the initial pretrial conference scheduled on April 16, 2021 to May 16, 2021, or at such other dates that the court deems as appropriate.

This is the first request for an adjournment/extension from the Defendant. Counsel for Plaintiff agrees that this letter shall be deemed as a joint letter from both sides.

Very truly yours,

/s/ Robert W. Wong

Robert W. Wong

cc. Bradley G. Mark, attorney for Plaintiff

Application GRANTED. The initial pretrial conference is adjourned to **May 21, 2021 at 10:00 a.m.** The parties' joint submission is due by **May 13, 2021.** The parties must appear for the conference by dialing (888) 363-4749, using the access code 3121171 and the security code 0579. Defendant must answer or move against the complaint by **May 21, 2021.**

SO ORDERED.



HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

4/13/2021